

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
Northern Division

IN RE GRACE OCEAN PRIVATE,
LIMITED, *et al.*,

Petitioners.

Civil Action No. 24-cv-000941-JKB

IN ADMIRALTY

**MOTION OF NONPARTY RESPONDENT
CHAMINDA KARIYAWASAM
TO SEAL OPPOSITION TO MOTION TO STRIKE**

Pursuant to Local Rule 105.11 and Paragraph 9 of this Court’s protective order (ECF 474), nonparty respondent Chaminda Kariyawasam (Respondent) hereby moves to seal the unredacted version of his opposition to Claimants’ motion to strike confidentiality designations, including Exhibits A-D attached thereto, and in support thereof states:

1. Respondent designated portions of his deposition transcript as “confidential” within the meaning of the protective order in this case. Claimants contest those designations through their motion to strike. The essential question before the Court, therefore, is whether certain information should remain protected from disclosure, including on the public docket. To preserve the status quo pending resolution of the motion, the parties necessarily need to seal significant portions of the motions papers that reveal the content of the sealed information and the grounds therefor.

2. Respondent has prepared and will file a public version of his opposition that does not reveal information Respondent contends is protected (as Claimants did with their motion to strike).

3. Respondent sent his proposed redactions from the opposition to lead Claimants’ counsel. Given their position on the motion to strike, Claimants obviously disagree that

the opposition contains information that should be protected, but Claimants' counsel has authorized undersigned counsel to state that Claimants do not object to the proposed public and sealed versions of the opposition pending resolution of the motion to strike.

Wherefore, Respondent respectfully requests that the motion to seal be granted.

Dated: June 9, 2025

Respectfully submitted,

Mallon LLC,

/s/ Marshall N. Perkins
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Counsel for Non-Party Respondent
Chaminda Kariyawasam

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of June, 2025, I caused copies of the foregoing document to be served through the ECF system on all registered counsel of record.

/s/ Marshall N. Perkins
Marshall N. Perkins (Fed. Bar No. 25514)